

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING, LTD., *et al.*,

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

FTX RECOVERY TRUST,

Plaintiff,

- against -

MANIFOLD MARKETS, INC., MANIFOLD
FOR CHARITY, INC., ROSS RHEINGANS-
YOO, and FTX PHILANTHROPY, INC.,

Defendants.

Adv. Pro. No. 24-50214 (KBO)

**DECLARATION OF SCOTT D. SIMON IN SUPPORT OF ROSS RHEINGANS-YOO'S
MOTION FOR SANCTIONS UNDER FEDERAL RULE OF BANKRUPTCY
PROCEDURE 9011, 28 U.S.C. § 1927, and 11 U.S.C. § 105**

Scott D. Simon hereby declares under penalty of perjury as follows:

1. I am a member in good standing of the Bar of the State of New York and have been admitted to practice *pro hac vice* before this Court. I am a partner of Goetz Platzer LLP, counsel for Ross Rheingans-Yoo ("Ross") in the above-captioned proceedings. I submit this declaration in support of Ross's *Motion for Sanctions Under Federal Rule of Bankruptcy 9011, 28 U.S.C. § 1927, and 11 U.S.C. § 105* ("Motion"), filed concurrently herewith, to place before the Court certain documents and information referenced in the Motion.

2. Annexed as **Exhibit A** is a certified copy of the transcript from the June 25, 2025

hearing at which the Court overruled the objection of the FTX Recovery Trust (“Trust”)¹ to Ross’s FDU Claim.

3. Annexed as **Exhibit B** is a true and correct copy of the Stipulation of Undisputed Facts Relating to Ross Rheingans-Yoo’s FDU Claim filed in connection with the Trust’s objection to Ross’s FDU Claim [D.I. 29218].

4. Annexed as **Exhibit C** is a true and correct copy of the “Bonus Memo” – a September 1, 2022 memorandum created by Bankman-Fried and shared with Rheingans-Yoo with the file name “Ross Rheingans-Yoo Review 2022S1 -- SBF -> RRY.”

5. Annexed as **Exhibit D** is a true and correct copy of correspondence between me and counsel for the Trust dated July 2, 2025.

6. Annexed as **Exhibit E** is a true and correct copy of correspondence between me and counsel for the Trust dated August 14-15, 2025.

7. Annexed as **Exhibit F** is a true and correct copy of correspondence between me and counsel for the Trust in which I served notice of Ross’s intent to make this Motion.

8. I served Trust counsel with notice of Ross’s intent to make this Motion at least 21 days prior to filing it. The Trust declined to withdraw the offending pleadings.

Dated: September 12, 2025
New York, New York

/s/ Scott D. Simon
Scott D. Simon

¹ The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].